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March 11, 2021

The Honorable Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 USDC SDNY
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Re: <u>United States v. Rebecca Linke</u>, *et al.* 20 CR 160 (MKV)

Dear Judge Vyskocil:

I represent Defendant Rebecca Linke, and submit this letter motion on her behalf seeking a modification of the travel limits of her bail as set forth below. The Government, by AUSA Sara Mortazavi does not object to the requested modification; likewise, Pretrial Services Officers Lura Jenkins and Rena Bolin do not object to the modification.

Ms. Linke was released on the day of her arrest, March 9, 2020, on a \$100,000 Personal Recognizance Bond cosigned by her parents. Her travel limits are the Southern and Eastern Districts of New York, and the District of New Jersey, where she lives. Ms. Linke has been fully compliant with all bail conditions at all times.

I respectfully request that her travel limitations be extended to permit her to attend two continuing education conferences in equine veterinary medical manipulation, given by the Integrative Veterinary Medical Institute. (www.ivmi.us; course description at https://www.ivmi.us/en-us/academics/advancedevmm.aspx). She enrolled in the courses, and their tuition was paid, prior to her arrest. These courses were originally scheduled for the periods July 9-12, and August 27-30, 2020. The Court approved Ms. Linke's request to attend last year (see ECF No. 221); at that time, however her ability to attend was foreclosed by the COVID-19 pandemic. Ms. Linke has now been fully vaccinated, and the courses have been rescheduled for the periods April 21-25 and July 7-11, 2021, at the IVMI campus in Ocala, FL.

Ms. Linke and I are available at any time for a conference, should the Court require additional information or have other questions. Her location and proposed travel itinerary will be provided to the Government and to Pretrial in advance.

I thank the Court for its consideration.

Sincerely,

David Wikstrom

DENIED. SO ORDERED.

Date: 3/12/2021 New York, New York

Mary Kay Wskocil